

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

Robert M. Taylor

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Thomas Bringman

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No. 22-03085-CV-S-SRB

*(to be filled in by the Clerk's Office)*

**REQUEST FOR TRIAL BY JURY**

Plaintiff requests trial by jury.  Yes  No

## I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Robert M. Taylor
Street Address	2546 W. Lincoln S.
City and County	Springfield, County Greene
State and Zip Code	Missouri, 65806
Telephone Number	
E-mail Address	rmt99975@yahoo.com

### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

#### Defendant No. 1

Name	Thomas Bringman
Job or Title (if known)	
Street Address	17108 Gensler Dr.
City and County	Three Rivers, County of Saint Joseph
State and Zip Code	MI 49093
Telephone Number	
E-mail Address (if known)	

#### Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_  
(if known)

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*

Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Violations of amendments I, IV, V, VI, XIV.

18 U. S. C. 241, 42 USC 1985(2)(3), 29 USC 794, 42 USC 12131-12134 *42 USC 2000e-5(F)*

Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

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Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

### A. The Plaintiff(s)

The plaintiff, *(name)* Robert M. Taylor, is a citizen of the State of *(name)* Missouri.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) Thomas J. Bringman, is a citizen of the State of (name) Michigan. *Or* is a citizen of (foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. *Or* is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

C. The Amount in Controversy

The amount in controversy---the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake---is more than \$75,000, not counting interest and costs of court, because (*explain*):

\$85,000.00 Loss incurred by plaintiff in a forced separation from USDA/FHA housing,  
established network of medical providers, any manner of familial support, by acts  
of intimidation, retaliation, and unlawful arrest committed by defendant over 2 yr period

### III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?

- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The defendant conspired with others threatening injury to plaintiff with arrest, oppressed the plaintiff with a denial of impartial adjudication, while threatening additional punitive arrests to intimidate plaintiff, in retaliation for attempting free exercise of civil rights secured by U.S. Constitution, and the Americans with Disability Act, Title II.

Because of disability, the defendant inflicted injury upon plaintiff causing mental anguish, anxiety, psychotic episodes, paranoia, loss of medical care, estrangement from familial support, and loss of income.

Involved were the defendant, a trio known as Overton gang, and police officers supervised by defendant

The defendant actively aided Overton gang with an unlawful arrest absent cause and contradicted by video

The events occurred in Three Rivers and Centreville, Michigan. St. Joseph County

The events started 10/07/2017 continuing to Nov 2019. Active denial of resolving issue continue to this day

#### IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

Compensatory damages for monetary loss by plaintiff incurred when denied enjoyment of residence.

Punitive damages for reckless endangerment of plaintiff and acts of malice conflicting with official duties.

Future damages of medical expenses from residual effect on person suffering mental derangement prior.

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes  No

Do you claim actual damages for the acts alleged in your complaint?

Yes  No

Do you claim punitive monetary damages?

Yes  No

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

Actual damages of \$85,000 incurred from cost of relocation caused by acts of defendant.

\$420,000 for the defendants acts under color of law that were committed in bad faith with malicious purpose and, administrating in a manner exhibiting willful and wanton disregard for the civil rights and property of plaintiff.

#### **V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/13, 2022.

Signature of Plaintiff

Printed Name of Plaintiff



Robert Taylor